

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

LIBERTY MUTUAL FIRE  
INSURANCE COMPANY,

*Plaintiff,*

v.

RED ROOF INNS, INC.; RED  
ROOF FRANCHISING, LLC;  
RRI WEST MANAGEMENT,  
LLC; FMW RRI NC, LLC,

Civil Action No.: 1:23-cv-02047-LMM

*Defendants,*

JANE DOE #1, JANE DOE #2, JANE  
DOE #3, JANE DOE #4, W.K., E.H.,  
M.M., R.P., M.B., D.P., A.F., C.A., R.K.,  
K.P., T.H., H.B., and K.M.,

*Nominal Defendants.*

**CONSENT MOTION TO EXTEND TIME TO OPPOSE  
THE DEFENDANTS' MOTION TO DISMISS**

Plaintiff Liberty Mutual Fire Insurance Company (the “Plaintiff” or “Liberty Mutual”), with the consent of Defendants Red Roof Inns, Inc., Red Roof Franchising, LLC, RRI West Management LLC, RRI III, LLC, and FMW RRI NC, LLC (collectively, the “Defendants”) and Nominal Defendant H.B. and pursuant to Federal Rule of Civil Procedure 6(b)(1)(a), respectfully requests a fourteen (14) day extension of the time to file its Opposition to Defendants’ Motion to Dismiss (Dkt. No. 81). In support therefore, the Plaintiff states as follows:

1. The Defendants filed their Motion to Dismiss on October 4, 2024. Nominal Defendant H.B. joined the Defendants' Motion to Dismiss on that same day (Dkt. No. 82). The Plaintiff's Opposition is presently due on October 18, 2024.

2. The Plaintiff has asked the Defendants and Nominal Defendant H.B. to consent to a fourteen (14) day extension of its time to respond to enable the Plaintiff to have sufficient time to prepare its response to the Motion to Dismiss. The Defendants and Nominal Defendant H.B. have consented to this request.

3. Accordingly, the Plaintiff respectfully requests that this Court grant its Consent Motion and extend the deadline for Plaintiff to oppose the Defendants' Motion to Dismiss to November 1, 2024.

Respectfully submitted, this 14th day of October 2024.

/s/ Andrew Rosenzweig

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*Attorneys for Nominal Defendant, H.B.*

**CERTIFICATE OF COMPLIANCE**

The undersigned counsel certifies that the foregoing has been prepared in Times New Roman (14 point) font, as required by the Court in Local Rule 5.1(B).

This 14th day of October 2024.

/s/ Andrew Rosenzweig

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**CERTIFICATE OF SERVICE**

This is to certify that I electronically filed the foregoing Consent Motion with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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